
POST REMOVAL COMPLIANCE PLAN

for

Nelson Galvanizing, Inc.
11-02 Broadway
Long Island City, New York

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of New York, Inc.

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1.0 INTRODUCTION

1.1 GENERAL

This Post Removal Compliance Plan has been developed for Nelson Galvanizing, Inc. located in Long Island City, New York. The plan describes the systems to be implemented for the prevention of a harmful discharge of substances at the facility. It also describes action procedures to be taken in the event of an emergency situation such as a spill.

2.0 FACILITY DESCRIPTION

2.1 SITE LOCATION

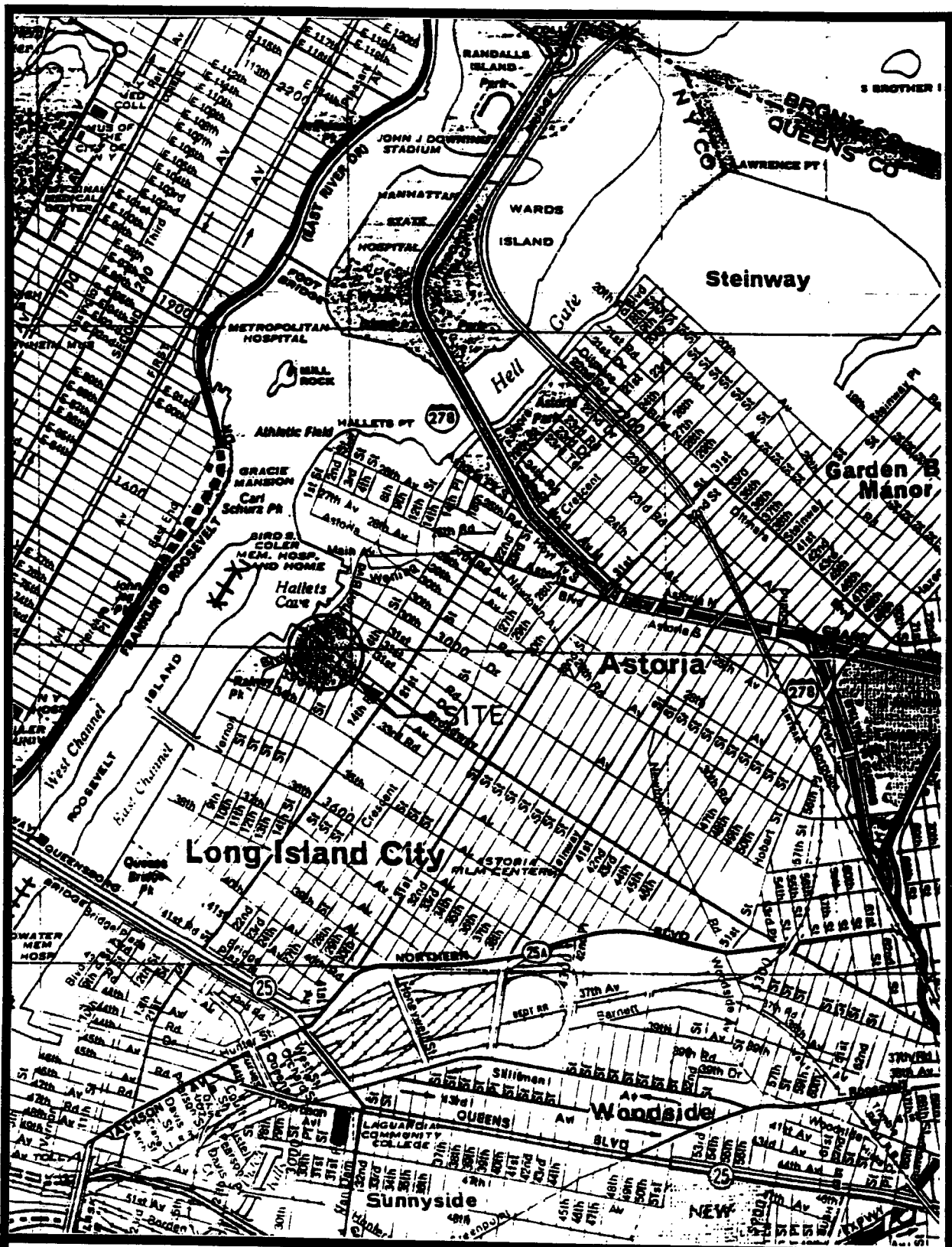
Nelson Galvanizing, Inc. is located at 11-02 Broadway between 11th and 12th Streets in Long Island City, Queens County, New York as shown in Figure 2-1. It is situated near the corner of Broadway and 11th Avenue. The building is a steel structure with aluminum and Fiberglass Reinforced Plastic side panels and a vented wood roof. The site is bordered by commercial business establishments and storage warehouses. The main entrance to the facility is accessed off 11th Street. A layout of the facility is shown in Figure 2-2.

2.2 SITE HISTORY

Nelson Galvanizing, Inc. has been in the operation of Zinc Galvanizing since about 1965.

2.3 PROCESS DESCRIPTION

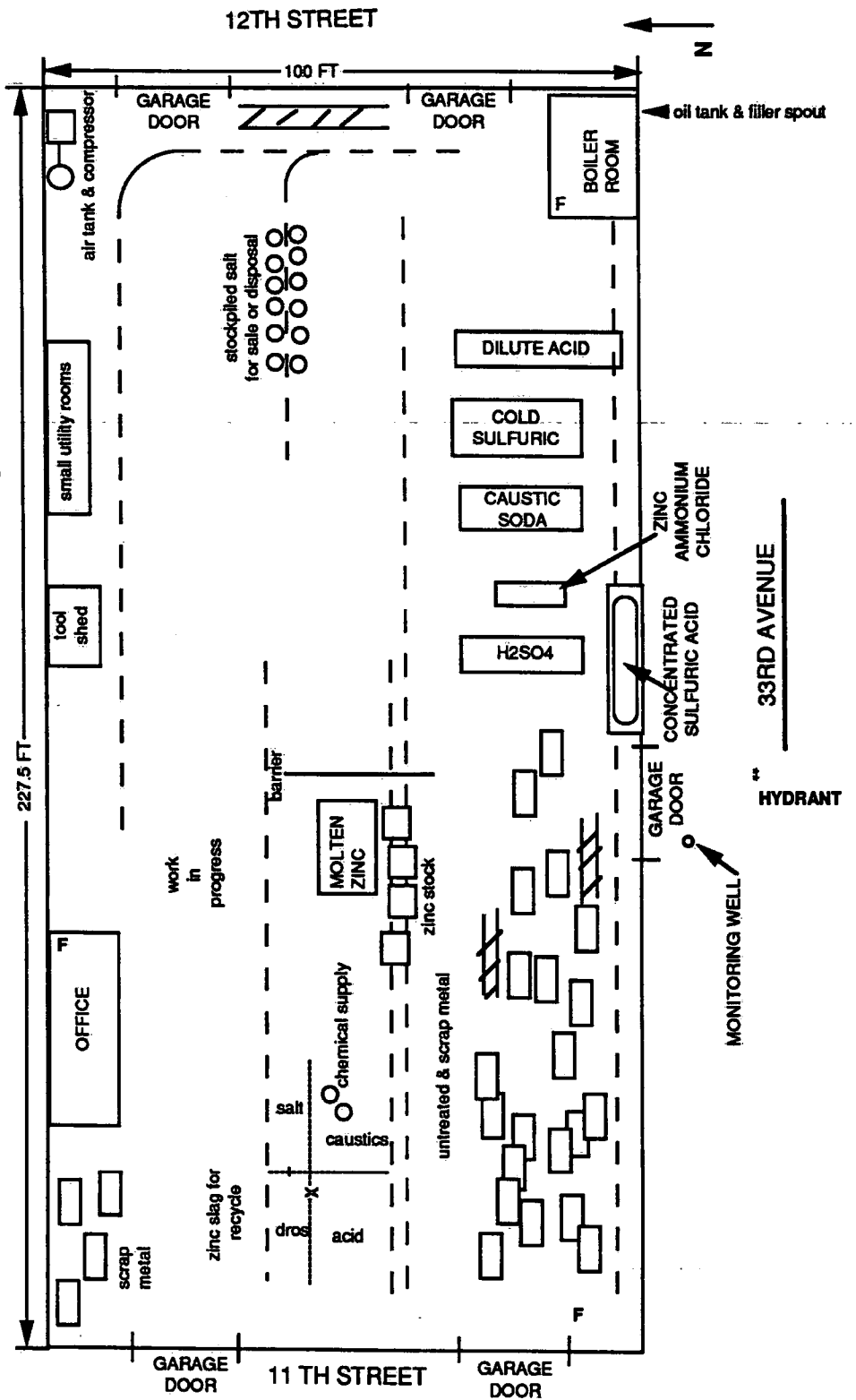
Nelson Galvanizing, Inc. performs custom hot-dip galvanizing. This description of Nelson Galvanizing is based on the operation as of November 1991, as of this date process has been suspended. The process involves coating clean, oxide free iron or steel with a thin layer of zinc by immersion in molten zinc at temperatures of approximately 840°F. The fundamental processing steps include degreasing in a hot alkaline solution (caustic soda), pickling in a sulfuric acid bath, prefluxing in a zinc ammonium chloride solution and finally immersing the article in a molten zinc bath. In 1988, the original concrete vats were decommissioned. They were replaced with above ground grid-frame polypropylene tanks (acid dips) and with steel tanks. Also on-site is a diked horizontal steel storage tank for a concentrated sulfuric acid; this tank is not currently in use. Table 2-1 provides a listing of



M&E Metcalf & Eddy
of New York, Inc.

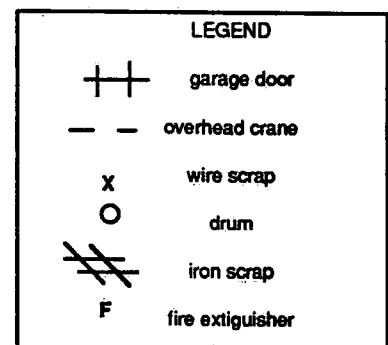
NELSON GALVANIZING, INC.
LONG ISLAND CITY, NY

FIGURE 2-1
SITE LOCATION MAP



NELSON GALVANIZING
SITE LAYOUT

FIGURE 2-2



**TABLE 2-1
PROCESS TANKS
NELSON GALVANIZING FACILITY**

<u>Description</u>	<u>Approximate Concentration</u>	<u>Volume (gallons)</u>	<u>Material of Construction</u>
1. Molten Zinc Tank	N/A	"	Steel - firebrick
2. Sulfuric Acid Tank	5-10%	5-6000	Polypropylene
3. Zinc Ammonium Chloride Tank	16° Baume	800	Steel
4. Caustic Soda Tank		2800	Steel
5. Sulfuric Acid (Weak) Tank		5-6000	Polypropylene
6. Sulfuric Acid (Holding) Tank		6700	Steel - wood liner
7. Concentrated Sulfuric Acid (Storage) Tank	Concentrated	Approx. 2000	Steel
8. Fuel Oil (Underground)	N/A	1250	Steel
20-22 Ton Zinc Capacity			

tanks currently in operation at Nelson Galvanizing showing capacity and contents. A layout sketch of the process and storage tanks is shown in Figure 2-3. Currently the facility operates one galvanizing tank constructed of steel and fire brick. The furnace is fueled by natural gas supplied by Con Edison. To increase the temperature of the cleaning solutions, hot water generated by the facility's oil fired boiler is fed through heating coils within the respective vats (see Figure 2-3) raising the temperatures to about 160°F. The temperature is manually controlled. The fuel oil consumed by the furnace is stored in a steel 1250 gallon underground storage tank located beneath the east floor of the building.

2.4 SOURCES OF BY-PRODUCTS

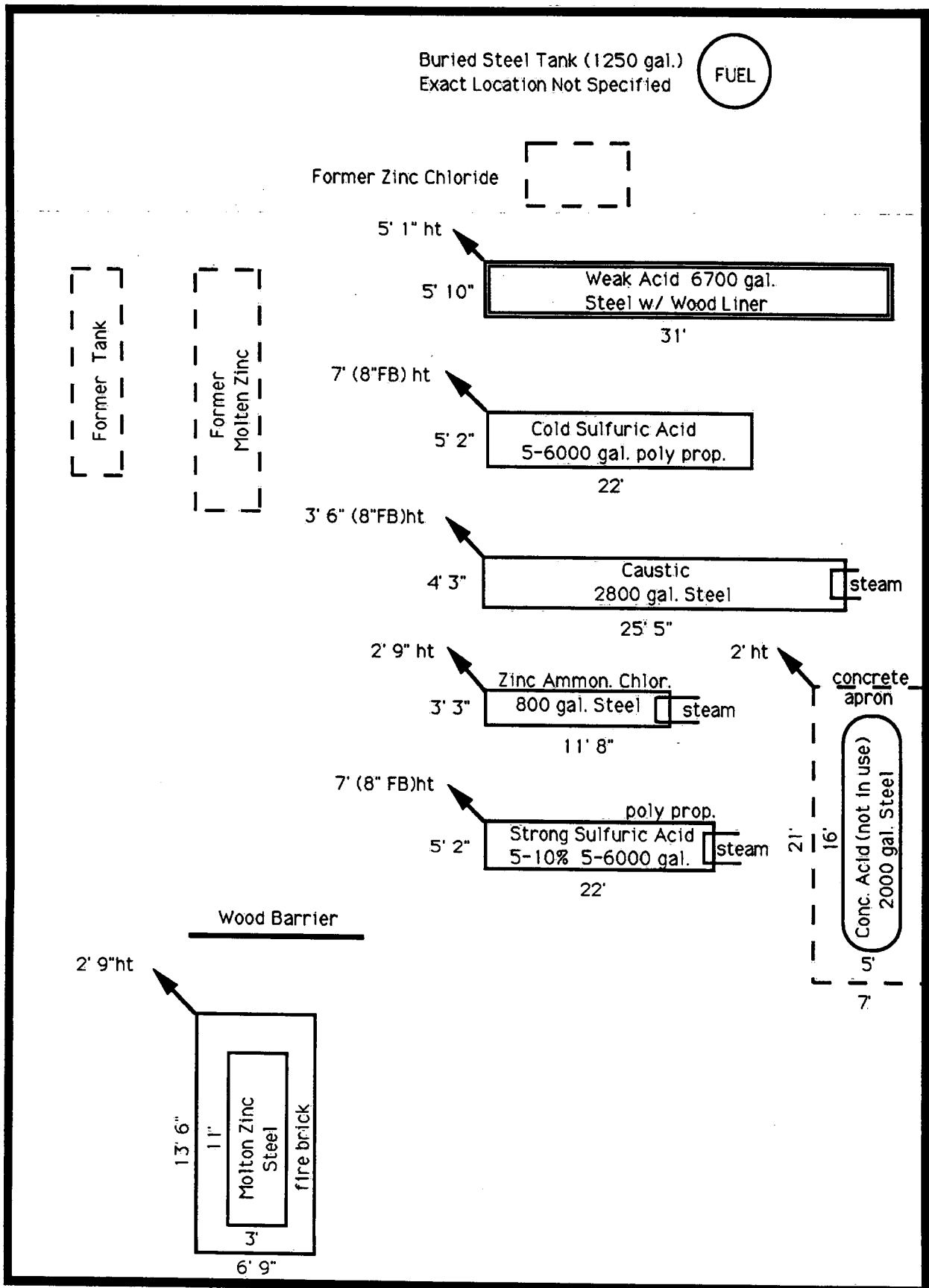
A review of Nelson Galvanizing, Inc. has indicated that specific process streams are generated during normal operations. These can be categorized, in general, as solid and liquid and solid by-products specific to the galvanizing process. A brief description of the processes and their respective by-products is listed below.

2.4.1 Sources of Liquids

Caustic Soda (sodium hydroxide) - is used to remove paint, heavy rust or residue buildup on steel products to be galvanized. The material is purchased as flake in 55 gallon drums. Flake caustic is added directly to the caustic tank for make-up. Approximately one 55 gallon drum is used per month. Spent caustic will, to the extent it is generated, be pumped to a tank truck for disposal.

Sulfuric Acid - typically maintained at an acid concentration of about 5%-10% by dilution in water, the acid is used to remove rust and scale on steel products to be galvanized. Usage rates varies but averaged about three 55 gallon drums of concentrated acid per month resulting in about 1,500 gallons of diluted waste acid per month. Acid make-up is done from 55 gallon drums of concentrated sulfuric acid. Present disposal involves pumping waste acid to a

FIGURE 2-3
NELSON GALVANIZING
PROCESS AND STORAGE TANKS



tank truck for disposal in compliance with applicable regulations.

Fluxing - a solution of zinc ammonium chloride and water (16°baume) is used as a preflux to prevent oxidation of the steel between the time it is cleaned and galvanized. Approximately two 100 lb. bags of zinc ammonium chloride are used per month for make-up. Although flux tank contents are not frequently discarded, spent liquors will be pumped to a tank truck for reclamation or disposal in compliance with applicable regulations. A molten top-flux of zinc ammonium chloride is used to further deoxidize the steel as it enters the zinc bath. Usage rates typically average 3,000 lbs. per month.

2.4.2 Solid By-Product

Ferrous Sulfate Crystal - generated as a result of a reaction between iron and sulfuric acid in the acid cleaning bath. The crystal is precipitated out of the spent acid solution. Typical generation rates for this by-product are approximately 2,000 lbs. per month, however, this varies somewhat since the process tanks are not cleaned at fixed time intervals. The need to clean a tank is determined by the acceptability of the cleaning capacity of the solution. The methods used to clean tanks and recover by-product are described below:

- Several drums of acid solution are siphoned off, allowed to cool to precipitate ferrous sulfate crystals from solution. Following precipitation, the supernatant liquor is pumped back into the tank and the collected crystals are stored.
- The entire tank is allowed to cool to precipitate ferrous sulfate from solution. A vacuum truck is used to store the supernatant liquor while the ferrous sulfate crystals are removed from the tank. Following removal of by-product crystals, the liquid is returned to the tank.

If recovery and sale of by-product ferrous sulfate crystal is not deemed feasible, the entire tank contents are disposed of in the following manner.

- The entire contents of the tank are removed by a vacuum truck and transported to an approved disposal site.

Ferrous sulfate crystals are currently being stored in 55 gallon polyethylene drums and held until the quantity is sufficient to ship.

As required by U.S. EPA Region II, Metcalf and Eddy of New York, a consulting firm, was engaged to oversee remedial activities involving inventorying, identifying, consolidating and staging of ferrous sulfate crystal for sale or disposal.

Zinc slag - This material is stored in 55 gallon drums on-site for collection and metal reclamation/recovery by a licensed firm.

Scrap metal - Scrap steel and galvanized steel are stored on site for collection by a reclamation firm.

2.5 PREVIOUS SPILL HISTORY

There are no records of previous spills that we are aware of. However, it was reported that a leak developed in the cold sulfuric acid tank in June 1991. The small quantity of the dilute acid tank drained onto the plant floor. A polypropylene welder repaired the tank promptly and the spill was contained and vacuumed up using a liquid shop vac and sausage booms.

3.0 SPILL POTENTIAL - TANK VOLUMES

Based on the current volume of acid and caustic liquids on-site and the nature of the operations, the potential currently exists for a spill and subsequent release of these materials to the environment. The large steel objects placed in the acid tanks, if improperly handled, could inadvertently crack or rupture the existing polypropylene tanks. The magnitude and associated hazard of a such spill would be dependent upon the size, location and content of the affected vessel. A brief description of each potential release is described below.

3.1 ACID SOLUTIONS

Acidic solutions are currently contained in two treatment tanks and one storage tank. The primary tank (polypropylene) is used for pickling of steel prior to the galvanizing operation. Acid solutions 5-10% in concentration, in this tank are typically heated to about 160°F to increase cleaning efficiency. The second acid tank (polypropylene) is typically used for cleaning material requiring longer cleaning periods. It is unheated. Based on measurements at the site on June 20, 1991 and communications with Nelson Galvanizing, Inc., the average volume of sulfuric acid solution contained on-site in these three storage tanks in aggregate is estimated to be 12-14,000 gallons.

3.2 CAUSTIC SOLUTION

Caustic solution is currently contained in one steel cleaning tank. Based on tank dimensions and contents measured on June 20, 1991, the average volume of sodium hydroxide solution contained within the cleaning tank is approximately 2800 gallons. Present disposal procedures are discussed in Section 2.4.1.

3.3 GALVANIZING FLUX

Galvanizing flux, specifically zinc ammonium chloride solution, is currently contained in one 800-850 gallon steel tank. Solutions in this tank are typically heated to 160°F to facilitate the fluxing. Based on volumes measured at the site on June 20, 1991 and communications with Nelson Galvanizing, Inc., the average volume of zinc ammonium chloride solution contained in this storage tank is approximately 780 gallons.

3.4 MOLTEN ZINC

The molten zinc galvanizing tank has a rated capacity of 22 tons of zinc. It is constructed of a steel inner tank, comparable in size to the galvanizing flux tank. The inner tank is encased in an outer steel shell 13'7" x 6'9" by 2'9" deep. Firebrick insulation is used between the inner tank and the outer shell. The tank is heated by gas burners in trenches running along both long sides of the tank.

Any spill of molten zinc would solidify almost immediately upon contacting the floor. No release of molten zinc outside of the immediate area of the tank or plant is foreseen.

3.5 UNDERGROUND FUEL OIL STORAGE TANK

Fuel oil used to power the facilities boiler is stored in a 1250 gallon underground storage tank. The tank is located below the east floor area of the facility. Fill and vent lines are located on the sidewalk outside the east wall of the building adjacent to 12th Avenue. The steel tank was installed prior to 1970.

3.6 CONCENTRATED ACID STORAGE TANK

An approximate 2,000 gallon steel storage tank is available on site for use, for bulk receipt and storage of concentrated sulfuric acid. The tank has a

concrete dike approximately 21ft. x 7ft. x 2ft. deep surrounding it. This secondary containment represents a volume of approximately 2,200 gallons, enough to hold the contents of the tank. It is recommended that the dike be epoxy coated on all surfaces.

4.0 SPILL PREVENTION, MITIGATION AND CONTAINMENT

EMERGENCY RESPONSE PROCEDURES

The primary factor in reducing the risk of an uncontrolled release during a spill incident is prevention. Based on an evaluation of material handling and storage several improvements will be implemented to reduce the threat of releases: 1) upgrading existing tanks and 2) secondary containment of bulk cleaning tanks 3) proper storage of material in appropriate waste management units and 4) proper handling practices.

There are no surface water bodies in the immediate area of the facility. Spills within the facility, if not contained, could be released to storm sewers in the area, and/or absorbed by the soil in unpaved areas in and around the facility.

4.1 SECONDARY CONTAINMENT OF BULK CLEANING TANKS

It is recommended that secondary containment be constructed for all bulk materials. This secondary containment system will be constructed to contain the entire contents of the tanks plus sufficient freeboard (at least 10%) to allow for precipitation which may collect. The secondary containment system was designed by CWE Engineering of N.Y.C. Because of the plant layout, it will be 55-60 ft. long by 32-35 ft. wide by 1 ft. high. This diked area will be capable of containing at least a 12,000 gallon spill.

The secondary containment area will be used for all of the chemical treatment/storage tanks. This containment area will be constructed on concrete slabs. It is recommended that a non-shrink epoxy coating be applied on its entire surface. The coating should be moisture insensitive and a non-shrink product which is designed for durability, chemical resistance to inorganic acids and alkalis, and solvents.

4.2 DRUM CONTAINMENT

4.2.1 Solid By-Products

All solid by-product materials will be contained in drums and staged in one of the two staging areas (see Figure 2-2).

1. Zinc slag - will be hot poured and/or stored in metal 55 gallon drums with lids.
2. Ferrous sulphate (salt crystals) - will be stored in sealed polypropylene drums.

All drums will be staged on pallets on concrete floor and stacked no more than two high. All drums will be sealed and labeled.

All solid by-product materials shall be sampled in compliance with applicable DOT, RCRA and NYS regulations prior to shipment, sale, or disposal, recycle.

All materials shall be labeled and stored in compliance with all applicable Federal, State, and City regulations.

4.2.2 Liquid

No liquid waste will be stored on site. All spent liquid acid, caustic or other process solutions will be tested and upon review of the results of the analysis will be processed either for disposal at an approved RCRA facility or for acceptance by a recycling facility. All the above mentioned liquids when sent for disposal will go directly from the process tank to the bulk disposal tank truck and properly disposed at the approved RCRA facility. No liquid waste will be treated on site. Presently, all liquid waste is being taken to a disposal facility of Chem Waste Management.

4.3 SPILLS

4.3.1 Loading and Unloading Procedures

At the present time no chemicals are delivered to the site in bulk. Spent treatment solutions are removed from the facility by tank truck. Also, tank trucks may be used on occasion to temporarily contain the contents of a treatment tank, for performing maintenance or other purposes.

Minor spills can occur during the filling or removing of chemicals from the tanks on-site. The extent of the spills can be reduced by conducting the following procedures when the tanks are being filled or chemicals are removed from the tanks. This procedure will be prominently posted near the loading/unloading area.

1. An attendant shall be present at all times;
2. Tanks will only be filled during daylight hours;
3. Tank trailer number is to be compared with that on shipping papers on the invoice to determine contents of the trailer and to avoid mixing of products.
4. Prior to bulk receipt of any potentially hazardous fluid materials at the site, including fuel oil, the receiving tank shall be gauged to determine available fill capacity.
5. Ensure that the receiving or delivering tank trailer is accurately spotted at the proper unloading spot.
6. Tank trailer brakes will be set, wheels blocked, and the driver will remain with the vehicle and observe the transfer lines during the entire loading or unloading procedure;
7. Caution signs shall be placed in the proximity of the tank trailer to give necessary warning to approaching vehicles and personnel. The signs will be left up until after the tank trailer is loaded/unloaded and disconnected from the discharge connection;
8. Unloading operations shall be performed only by trained persons properly instructed and responsible for careful compliance with applicable regulations;

9. Tank trucks used to pump out tank contents shall arrive empty and have sufficient capacity to receive the contents of the tank to be pumped. The Nelson attendant should visually inspect every arriving truck to verify that it is indeed empty.

4.3.2 Minor Spills (Loading and Unloading)

Any small leaks during loading /unloading are to be contained and cleaned up immediately. If a leak develops the following should occur:

1. Immediately stop the process
2. Contain the spill from spreading
3. Clean up the spill by using sorbents or pillows

These items and other spill response equipment are indicated in Section 4.4.

Should a tank truck develop a leak at the site, Emergency Response actions will be initiated. This will ensure that management is notified of the situation and assistance is obtained without delay. Personnel protective safety equipment and emergency response equipment will be located at the site.

Priority will be given to plugging the leak and to transferring the content of the truck to another vehicle, or a holding tank(if available).

4.3.3 Minor Spills (Production and Storage)

A small leak in a production or storage tank can quickly be detected by the plant operators and immediate action taken to stop the leak by closing valves or any other means that may be available.

If the leak has not been completely stopped by the immediate action of the operator, then Emergency Response actions will be initiated. This will ensure that management is notified of the situation and assistance is obtained without delay. Appropriate personnel protective equipment, and emergency response equipment will be located at the site.

Priority will be given to plugging the leak and to transferring the contents from the affected system to another vessel or container if available, if this will reduce or stop the leak.

Should it prove impossible to immediately stop a leak, then the leak will be considered a major internal spill.

4.3.4 Major Spill (Tank Trucks, Storage, Production)

Major failures could arise from the following causes:

(a) burst hose or line (b) valve failure (c) tank overflow (d) tank rupture (e) steel falling from overhead crane (f) steel puncturing tank (g) human error.

A spill will be considered major based on listing of CERCLA hazardous substances and their respective Reportable Quantities in 40CFR Part 302.4, or, if it takes place in an area without secondary containment or, if it results from the failure of a processing/holding tank with discharge of a significant portion of the contents (100 gallons or more) to the secondary containment system.

The spill will be reported to the appropriate agencies listed in Appendix A, if the probability exists that a reportable quantity of a hazardous substance has entered the storm drain system, spilled on an unpaved area, or on a paved area under such conditions (such as storm run-off) that would cause an uncontrollable discharge of such substances.

Emergency Response actions will be initiated if not already done.

4.3.5 Emergency Response Actions

Emergency response actions will entail (1) notifying the plant manager of the occurrence; (2) notify National Response Center and local DEC Spill Hotline - see Appendix A - if spill cannot be contained, (3) summoning an Emergency

Response Contractor to the site - see Appendix B - and (4) Storm drains in the affected areas will be blocked, unless prevailing conditions would cause such to increase the hazard.

Upon acceptance of this plan, the owner will secure and put on notice a standby spill response company that is able to respond to and handle any minor/major spill.

4.4 Spill Response Equipment

The following equipment shall be stationed on-site at a designated area at all times.

1. Acid/Alkali(Universal) sorbents - ten 30 lb. bags
2. Universal absorbent pillows - 2 boxes (16) size 9" x 15"
3. Absorbent booms-1 case (40) 48" x 4"
4. Empty 85 gallon or overpack drums on-site - 4 drums
5. 55 gallon wet vac
6. Oil Dry - 50lbs.
7. Portable shower for caustic or acid burns
8. Two 55 gallon salvage drums for storing used sorbent
9. PVC drum liners
10. Neutralizing agent (lime) - two 50lb. bags
11. Personal protective equipment: respirators; safety goggles with splash guards; chemical resistance aprons; chemical resistant gloves; chemical resistant boots

A supply of appropriate sorbents, pillows and booms, will be located in the facility. Sorbents shall be used liberally to prevent any spill from standing on the floor or entering sewers. All spills shall be cleaned up immediately. Any sorbent which has been used shall be picked up immediately after its use and deposited in suitable containers (PVC lined 55 gal. drums). Supplies of spent sorbents shall be promptly replenished.

5.0 INSPECTION AND RECORD KEEPING

5.1 INSPECTION PROCEDURES

Weekly inspections will be made of all tanks, valves, and piping for signs of deterioration and to identify any signs of spillage, disrepair, leakage or fatigue by the Plant Manager.

5.2 BULK TRANSFERS

All bulk transfers to and from the facility tanks shall be documented. Prior to bulk receipt of any potentially hazardous fluid materials at the site, including fuel oil, the receiving tank shall be gauged and the value recorded. Tank trucks receiving process solutions from the facility shall arrive empty, and shall have sufficient capacity to receive the contents of the tank to be pumped. The capacity of the tank trunk and the amount of fluid to be transferred shall be verified and recorded prior to commencing pumping operations.

5.3 RECORD KEEPING

A complete copy of this plan shall be made available at the facility during all hours of operation. The listing of Emergency Phone Numbers and Emergency Response Contractors shall be posted at all times. This plan will be updated upon any major change in process, containment, or shipping procedure.

Documentation of quantities of all material in the above ground tanks must be updated weekly at a minimum. The underground fuel storage tank shall be gauged monthly at a minimum. The supply of spill response equipment shall be verified monthly including all materials as outlined in Section 4. This

inventory information will be recorded by the Plant Manager and kept on file in his office.

Detailed records of initial and annual personnel training in the understanding and operation of spill prevention and spill cleanup procedures will also be documented and kept on file by the Plant Manager.

6.0 SECURITY

The facility will be locked at all times when the plant is not in operation or unattended by responsible personnel.

The plant shall not be operated without a responsible supervisor or foreman on site, and without sufficient personnel to respond to a spill emergency.

No unauthorized persons shall be permitted in the facility.

Contractors shall be informed of potential hazards prior to admittance to the facility. They shall be directed by a responsible person to the area or equipment to be worked on. Prior to beginning work, the affected unit or area shall be checked by knowledgeable plant personnel to assure that no hazards will result from the work to be performed.

To warn co-workers or visitors of dangerous situations the supervisor for each process should be equipped with an air horn. When potentially dangerous work is to begin the supervisor shall warn people in the area with two (2) short blasts of the air horn. If the supervisor sees someone wandering into the restricted area, the supervisor shall warn the person with a long blast of the air horn.

7.0 PERSONNEL TRAINING

7.1 HAZARD IDENTIFICATION

All operating personnel will be trained to identify actual or potential hazards at the Nelson Galvanizing facility. All operating personnel must understand the operations and maintenance of the equipment used in the galvanizing process.

Spill prevention briefings will be conducted at monthly intervals by a responsible manager, foreman or supervisor in order to assure adequate understanding of the plant operations. Discussions during these briefings will include detailed information concerning spill events, tank failures, malfunctioning components, and potential for such incidents to occur, chemical hazard precautionary measures, and emergency response procedures. The Plant Manager will maintain records indicating who attended the meetings and a summary of the topics discussed.

Personnel involved in the galvanizing process shall have a complete understanding of all the following:

1. Tank location, capacity and products stored.
2. Location and operation of spill containment equipment and personal protective equipment.
3. Personal safety considerations during spill response.

All personnel shall be instructed in site hazards as required by Federal OSHA Hazard Communications Act and applicable NYS regulations.

7.2 PERSONNEL PROTECTIVE EQUIPMENT

All personnel on-site shall wear hard-hats, safety shoes, protective eye-gear such as safety glasses with splash guards or safety goggles, chemical resistant gloves and synthetic aprons while working at the Nelson Galvanizing facility. In the event of a spill, on-site personnel who will be directly involved in preliminary spill containment and control procedures shall wear the same protective equipment as above plus chemical resistant boots.

8.0 PLAN AMENDMENTS

This plan shall be amended whenever there is a change in the facility design, construction, operation or maintenance which materially affects the facility's potential for a discharge.

A review and evaluation of the Post Removal Compliance Plan shall be completed every year. If necessary, the owner and operator shall amend the plan within six (6) months of the review to include more effective prevention and control technology.

APPENDIX A

APPENDIX A

EMERGENCY REPORTING PHONE LISTING

Any spill which leaves the facility grounds or which is potentially harmful to the public health, welfare or to national resources must be reported to the appropriate agencies.

The following shall be contacted only by the plant manager or designated representative, based upon the nature and extent of the spill or release.

New York Oil & Hazardous Materials Spill Hotline	1-800-457-7362
National Response Center	1-800-424-8802
Fire	Dial 911
Ambulance	Dial 911
Police	718-784-5411
Hospital	718-932-1000

APPENDIX B

APPENDIX B

EMERGENCY RESPONSE CONTRACTORS AND LABORATORIES

Direct Environmental
66 Botis Street
West Babylon, New York 11704

AAA Oil Pollution Specialists, Inc.
36-28 14th Street
Long Island City, New York 11106
718-392-8000

American Medical Waste Systems, Inc.
344 Duffy Ave
Hicksville, New York 11801
516-937-1617

LABORATORIES

New York Testing Laboratories Inc.
81 Urban Avenue
Westbury, New York 11590

APPENDIX C

APPENDIX C

TYPICAL INVENTORY/RECORD KEEPING FORMS

STORAGE TANK GAUGING SCHEDULE

TANK #	DATE/TIME	RATED TANK VOLUME(GAL.)	TANK LIQUID LEVEL(IN.)	CORRESPONDING VOLUME(GAL.)	MAX. ADD. ALLOW. GALS	GAUGER	FACILITY SUPERVISOR
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